



**I. CONTESTED MATTERS GOING FORWARD:**

1. ***Expedited Motion to Dismiss.*** Expedited Motion to Dismiss Involuntary Petition and Request for Damages [Docket No. 14].

Objection Deadline: February 22, 2021, at 12:00 p.m. (prevailing Eastern Time) for all interested parties. As reflected at Docket No. 36, the objection deadline for petitioners' counsel was extended through February 23, 2021 at 5:00 a.m. (prevailing Eastern Time).

Objections and Responses Received:

- A. No objections were received or filed on the docket.
- B. Joinder in Involuntary Case Pursuant to 11 U.S.C. 303(c) and Rule 1003(b) of the Federal Bankruptcy Rules [Docket No. 35].
- C. First Motion for Adjournment to Protect the Statutory Rights of the Unsecured Creditors Against the Alleged Debtor [Docket No. 37].
  - i. Letter to Judge Glenn in Response to Public Interest Capital, LLC's Adjournment Request [Docket No. 39].

Petitioners' Pleadings:

- D. Involuntary Petition [Docket No. 1].
- E. Amended Involuntary Petition [Docket No. 2].
- F. Declaration of Austin C. Smith [Docket No. 3].
- G. Summons to Debtor in Involuntary Case [Docket No. 5].
- H. Petitioners' Letter Requesting Summary Judgment [Docket No. 17].
- I. Petitioners' Letter Amended Letter Requesting Summary Judgment [Docket No. 22].
  - i. Declaration of Austin C. Smith [Docket No. 23].
  - ii. Order Denying Letter Requests [Docket No. 24].
- J. Letter Requesting Five Hour Extension [Docket No. 30]
  - i. Memorandum Endorsed So Ordered Letter [Docket No. 31].
- K. Letter Filed Requesting 12-hour Extension [Docket No. 32].

- i. Memorandum Endorsed So Ordered Letter [Docket No. 33].
- ii. Amended Letter Filed Requesting 24-hour Extension [Docket No. 34].
- iii. Memorandum Endorsed So Ordered Letter (Re Docket No. 34) [Docket No. 36].

Putative Debtors' Pleadings and Related Documents:

- A. Corporate Ownership Statement [Docket No. 13].
- B. Navient Solutions, LLC's Motion to Shorten the Notice Period with Respect to Navient Solutions, LLC's Expedited Motion to Dismiss Involuntary Petition and Request for Damages [Docket No. 15].
- C. Declaration of Stephen E. Hessler, P.C. in Support of the Expedited Motion to Dismiss Involuntary Petition and Request for Damages [Docket No. 16].
- D. Order Shortening the Notice Period with Respect to Navient Solutions, LLC's Expedited Motion to Dismiss Involuntary Petition and Request for Damages [Docket No. 18].
- E. Order Shortening the Notice Period with Respect to Navient Solutions, LLC's Expedited Motion to Dismiss Involuntary Petition and Request for Damages [Docket No. 19].
- F. Notice of Hearing on the Expedited Motion to Dismiss Involuntary Petition and Request for Damages to be Held on February 25, 2021 Hearing [Docket No. 20].
- G. Certificate of Service (Re Docket Nos. 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 19, 20) [Docket No. 28].
- H. Declaration of Stephen E. Hessler in Support of the Expedited Motion to Dismiss Involuntary Petition and Request for Damages [Docket No. 29].
- I. Certificate of Service (re Docket No. 29) [Docket No. 38].

**Status:** This matter is going forward.

*[Remainder of page intentionally left blank]*

Dated: February 24, 2021

/s/ Stephen E. Hessler

Stephen E. Hessler, as President of Stephen E.  
Hessler P.C., partner of Kirkland & Ellis LLP  
Chad J. Husnick, P.C.

Jennifer Levy (admitted *pro hac vice*)

AnnElyse Scarlett Gains

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: stephen.hessler@kirkland.com

Email: chad.husnick@kirkland.com

Email: jennifer.levy@kirkland.com

Email: annelyse.gains@kirkland.com

*Co-Counsel for Navient Solutions, LLC*

Thomas M. Farrell (admitted *pro hac vice*)

K. Elizabeth Sieg (admitted *pro hac vice*)

Joseph Florczak (admitted *pro hac vice*)

**MCGUIREWOODS LLP**

800 East Canal Street

Richmond, Virginia 23219

Telephone: (804) 775-1000

Email: tfarrell@mcguirewoods.com

Email: bsieg@mcguirewoods.com

Email: jflorczak@mcguirewoods.com

*Co-Counsel for Navient Solutions, LLC*